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ROBERT C. GOTTLIEB
CELIA A. GORDON

JUSTIN F. HEINRICH
BRYAN L. BROWNS

Jan. 20, 2011
s/ Judge Raymond J. Dearie

RJ Dearie
USDS

January 20, 2011

VIA ECF and facsimile

The Honorable Raymond J. Dearie
Chief Judge of the United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Adis Medunjanin*
No. 1:10-CR-00019 (RJD)

Dear Judge Dearie:

This law firm represents the defendant Adis Medunjanin in the above-referenced criminal action along with co-counsel Stephanie Carvlin, Esq. and Mitchell Dinnerstein, Esq. As Your Honor may recall, at the last conference the government indicated that additional classified discovery possibly would be turned over to the defense prior to the suppression hearing scheduled for January 25, 2011. We did, in fact, receive additional classified discovery from the government last Friday and completed our review of the discovery yesterday. Based upon our review, we believe it necessary to supplement our motion papers and to request additional time to prepare for the suppression hearing. We have spoken with A.U.S.A. Bitkower and he consents to this request.

Accordingly, we respectfully request that the appearance scheduled for Tuesday, January 25, 2011 be for the purpose of a conference.

Very truly yours,

RG
Robert C. Gottlieb (RG1930)

cc: A.U.S.A. David Bitkower (via email and ECF)
A.U.S.A. James Loonam (via email and ECF)